

MARINO, TORTORELLA & BOYLE, P.C.

KEVIN H. MARINO
JOHN D. TORTORELLA
JOHN A. BOYLE

ROSEANN BASSLER DAL PRA*
EREZ J. DAVY*
MICHAEL J. FLYNN

ATTORNEYS AT LAW
437 SOUTHERN BOULEVARD
CHATHAM, NEW JERSEY 07928-1488
TELEPHONE (973) 824-9300
FAX (973) 824-8425
www.khmarino.com

875 THIRD AVENUE, 21ST FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 307-3700
FAX (212) 542-3790
e-mail: jtortorella@khmarino.com

*OF COUNSEL

April 18, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending April 11 and April 18. We have also attached a current list of pending motions.

1. The parties continued to meet and confer regarding a privilege log protocol.
2. Plaintiffs and the PBM Defendants filed letter briefs regarding custodians and disclosure regarding data fields. *See* ECF Nos. 489–493, 510-512, 514.
3. Defendants conferred with certain Plaintiffs in the SFP Track and AG Track regarding deficiencies Defendants identified in Plaintiff Fact Sheet responses and productions.
4. On April 7, 2025, Defendants proposed a schedule for briefing common deficiencies in Self-Funded Payer Plaintiff Fact Sheet responses.
5. The parties scheduled a meet and confer for Tuesday, April 22 to discuss a deposition protocol.
6. The parties continued to meet and confer on search terms.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s Matthew F. Gately
Matthew F. Gately
Liaison Counsel for
Class Action Track

/s Joanne Cicala
Joanne Cicala
Liaison Counsel for
State Attorneys General Track

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ATTORNEYS AT LAW

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/s David R. Buchanan
David R. Buchanan
*Liaison Counsel for
Self-Funded Payer Track*

/s John D. Tortorella
John D. Tortorella

Enclosures

cc: Honorable Rukhsanah L. Singh, U.S.M.J.
All counsel of record